

Richard A. Illmer
State Bar No. 10388350
HUSCH BLACKWELL LLP
1900 N. Pearl Street, Suite 1800
Dallas, Texas 75201
Telephone: 214.999.6100
Facsimile: 214.999.6170

Vickie L. Driver
State Bar No. 24026886
CROWE & DUNLEVY, P.C.
1919 McKinney Avenue, Suite 100
Dallas, Texas 75201
Telephone: 214.420.2163
Facsimile: 214.736.1762
Counsel for Republic Business Credit, LLC

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

**BAILEY TOOL &
MANUFACTURING COMPANY.**

Debtor.

**BAILEY TOOL &
MANUFACTURING COMPANY,
HUNT HINGES, INC. and
CAFARELLI METALS, INC.,**

Plaintiffs,

v.

REPUBLIC BUSINESS CREDIT, LLC,

Defendant and Counter-Plaintiff,

v.

**BAILEY TOOL &
MANUFACTURING COMPANY,
HUNT HINGES, INC. and
CAFARELLI METALS, INC.,**

Counter-Defendant.

**Case No. 16-30503-SGJ-7
Chapter 7**

Adv. No. 16-03025-SGJ

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[https://huschblackwell-my.sharepoint.com/personal/karen\\_massey\\_huschblackwell\\_com/Documents/Republic Business Credit, LLC's Agreed Motion for Extension of Time to File Response to Applications for Attorney's Fees to be Awarded in final Judgment](https://huschblackwell-my.sharepoint.com/personal/karen_massey_huschblackwell_com/Documents/Republic Business Credit, LLC's Agreed Motion for Extension of Time to File Response to Applications for Attorney's Fees to be Awarded in final Judgment)

3. On January 13, 2022, Trustee filed his Application for Fees to be Awarded in Final Judgment on January 13, 2022. (“Trustee’s Fee Motion”). [Dkt. 371] in this instant adversary proceeding.

4. The Motion to Approve is currently set for hearing before the Honorable Stacey G.C. Jernigan on February 10, 2002.

5. Counsel for Trustee and Republic have agreed that any response or objection to the Trustee’s Fee Motion shall be extended until February 18, 2022. If the Motion to Approve is granted, the Trustee’s Fee Motion will be moot.

6. In addition, on January 13, 2022, counsel for Buttles filed their Application of Martin | Walton for Allowance of Compensation and Reimbursement of Expenses Under TBCC § 27.01 [Dkt. 373] and Application of Rochelle McCullough, LLP for Allowance of Compensation and Reimbursement of Expenses Under TBCC § 27.01 [Dkt. 372] (“Buttles’ Fee Motions”). RBC’s response and objection to the Buttles’ Fee Motions is currently due on Monday, January 24, 2022. RBC and Buttles are in settlement negotiations. RBC and Buttles agree, and respectfully ask the court to order, that RBC’s deadline to respond to the Buttles Fee Motions be extended to February 18, 2022.

THEREFORE, Republic Business Credit, LLC respectfully requests that the Court grant this Agreed Motion for Extension of Time to File Response to Trustee’s Fee Motion and Buttles’ Fee Motions abating RBC’s response or objection to the Trustee’s Fee Motion and Buttles’ Fee Motions until February 18, 2022.

Dated: January 21, 2022

Respectfully submitted,

By: /s/ Richard A. Illmer  
Richard A. Illmer  
Texas Bar No. 10388350  
[Rick.Illmer@huschblackwell.com](mailto:Rick.Illmer@huschblackwell.com)

**HUSCH BLACKWELL LLP**  
1900 N. Pearl Street, Suite 1800  
Dallas, Texas 75201  
(214) 999-6100  
(214) 999-6170 (facsimile)

Vickie L. Driver  
State Bar No. 24026886  
[Vickie.Driver@crowedunlevy.com](mailto:Vickie.Driver@crowedunlevy.com)

**CROWE & DUNLEVY, P.C.**  
2525 McKinnon Street, Suite 425  
Dallas, TX 75201  
(214) 420-2142  
(214) 736-1747 (facsimile)  
***Attorneys for Republic Business Credit, LLC***

**CERTIFICATE OF CONFERENCE**

I confirm on January 18, 2022, I conferred with Sean McCaffity, counsel for Trustee regarding the merits of this Motion. Mr. McCaffity is in agreement with the relief sought herein. I conferred with Michael Rochelle and Ken Johnson, counsel for John Buttles, on January 21, 2022 and both are in agreement with the relief sought herein.

/s/ Richard A. Illmer  
Richard A. Illmer

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon the parties receiving notice via email on counsel for the Chapter 7 Trustee and Butties on January 21, 2022 as follows:

Jerry Kenneth Johnson, II  
MARTIN WALTON LLP  
1335 Space Park Drive, Suite C  
Houston, Texas 77058  
*Attorney for John Butties*

Michael R. Rochelle  
ROCHELLE MCCULLOUGH LLP  
325 N. St. Paul Street, Suite 4500  
Dallas, Texas 75201  
*Attorney for John Butties*

Jerry C. Alexander  
Chris Robison  
PASSMAN & JONES, PC  
1201 Elm Street, Suite 2500  
Dallas, Texas 75270  
*Attorney for Trustee James W. Cunningham*

Daniel J. Sherman  
SHERMAN & YAQUINTO  
509 N. Montclair Avenue.  
Dallas, Texas 75208-5498  
*Attorney for Trustee James W. Cunningham*

Andrew Sommerman  
Sean McCaffity  
SOMMERMAN & QUESADA, L.L.P.  
3811 Turtle Creek Boulevard, Suite 1400,  
Dallas, Texas 75219  
*Attorneys for Trustee James W. Cunningham*

/s/ Richard A. Illmer

Richard A. Illmer